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February 7, 2025

VIA ECF

The Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Keith Clingman v. Guardian Legal Group et. al, No. 25-cv-00278 VMS (E.D.N.Y.)

Dear Judge Scanlon:

We are counsel for the defendants in the above-styled action. Pursuant to Your Honor's Individual Practices, we write with the consent of plaintiff Keith Clingman to request an adjournment of the time for Guardian Legal Group, LLC to respond to the Complaint as follows:

1. Defendant Guardian Legal Group's response to the Complaint is presently due on or about February 14, 2025. Plaintiff has consented to a thirty-day extension though and including March 18, 2025. Plaintiff has not yet served the other defendant, Cason B. Carter.
2. This is the first request for an extension of any kind in this action.
3. This adjournment request is made with the consent of the plaintiff.
4. The parties wish to discuss the possibility of settlement and believe an adjournment would facilitate such a discussion.
5. This request does not affect any other scheduled dates in this action.

We respectfully request that the Court grant this application. Thank you in advance for your attention.

Very truly yours,

/s/ Scott Shaffer

Scott Shaffer

cc: Keith Clingman (via e-mail and ECF)